



APR 21 1999

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Michael Helser, Ph.D.
Vice President of Merchandising
Square Roots, Inc.
1500 Jackson Street, N.E.
Minneapolis, Minnesota 55413

Dear Dr. Helser:

This is in response to your letter of January 26, 1999 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that Square Roots, Inc. is making the following claims, among others, for the products:

Square Roots Square One Multivitamins:

- "...prove beneficial against serious disease..."
- "...set at levels scientifically established for positive prevention"
- "...set at levels scientifically recommended for disease prevention"
- "...will prove beneficial against serious diseases (and fighting disease is good)"
- "Consumption of carotenoid-rich foods has been shown to reduce the risk of some cancers"

Square Roots Bodywork

- "...joint pain..."
- "...enhanced injury recovery..."

Square Roots Push Play

- "This antinflammatory helps alleviate the symptoms of joint and muscle injury..."
- "...treat joint and muscle pain"
- "...effective inflammation formula"
- "...safe and effective inflammation formula"

Square Roots Tough Cell

- "...contribute to aging and degenerative diseases"

Square Roots Vegetable Scoop

- "...helpful in lowering the risk of some types of cancer"

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Square Roots Soy Protein Scoop (Plain and chocolate Fudge)

“Populations that make soy a fundamental part of their daily diet have shown a significant lack of breast, prostate and colon cancer”

“...reduces elevated cholesterol levels to lessen the risk of heart disease”

“...reduce hot flash occurrence...”

Square Roots Fiber Scoop

“...reduced occurrence of colon cancer...”

“...colon cancer-fighting fiber in their diet.”

Square Roots Point Guard

“...helps lower cholesterol and blood pressure”

“...decrease product of LDL (bad) cholesterol”

“...aids in reducing cholesterol”

for “men and women with mild to moderate elevation in cholesterol”

Square Roots Top Seed Flax Seed Oil Supplement

for “...those with a family history of heart disease”

Square Roots Full Circ

“...helps keep LDL cholesterol (the naughty stuff) from oxidizing and depositing on arterial walls”

for “...those with a family history of heart disease”

“...adding Full Circ to your heart regimen”

Square Roots Pro Bono

“...prevention of osteoporosis”

Square Roots Food Phyte

“...reduced cancer risk, increased bone density and reduced menopausal symptoms”

Square Roots Over Easy PMS Relief

“These fatty acids are generally lacking in most women’s diets, which can add to PMS severity. Over Easy aids in the relief of both the physical and emotional symptoms common to PMS. We highly recommend the primroses in Over Easy, and any roses in a vase, for maximum PMS relief.”

for “women with mild to moderate symptoms of PMS”

“...to minimize PMS discomfort”

Square Roots Defense Lozenges and Square Roots Defense Powder

“Stick out your tongue at the flu”

“When cold and flu symptoms start plotting against your immune system”

“...dissolve the duration and severity of common cold and flu symptoms”

“Three effective cold-fighting ingredients...”

“...beat back the major effects of colds and flu”

“Everything cold and flu symptoms hate about our lozenge formula is present in stir-and sip powder form”

for “anyone suffering from the symptoms of a cold or flu”

“...to minimize a cold or flue [sic] episode”

Square Routine for Cholesterol

“If it’s high, it’s trouble. This serious health problem can be considerably improved...”

“...into one cholesterol-busting product”

“for anyone with a moderate cholesterol elevation”

Square Routine for A Healthy Heart

“For those with heart disease or other cardiovascular issues, this is a package you can love”

Square Roots Fiber Capsules

“...put more cholesterol lowering, colon cancer-fighting fiber in their diet”

21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statements that you are making for these products suggest that they are intended to treat, prevent, or mitigate diseases. These claims do not meet the requirements of 21 U.S.C. 343(r)(6). These claims suggest that these products are intended for use as drugs within the meaning of 21 U.S.C. 321(g)(1)(B), and that they are subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA’s Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, 7520 Standish Place, Rockville, Maryland 20855.

Your submission also indicates that, for the product **Square Roots Fiber Scoop**, you are making the claims “Fiber has been associated with lower cholesterol...” and “...cholesterol lowering.”

These statements are not claims subject to 21 U.S.C. 343(r)(6), but claims subject to 21 U.S.C. 343(r)(1)(B). FDA has authorized a health claim on the relationship between soluble fiber from certain foods (such as beta glucan from oat bran) and risk of coronary heart disease and the ability of soluble fiber to reduce blood cholesterol

(see 21 CFR 101.81). A dietary supplement that meets the eligibility and message requirements set forth in this regulation may bear a claim for the relationship between soluble fiber from oat bran and risk of coronary heart disease. A health claim on the label or in the labeling of a food or dietary supplement that is not in accordance with the requirements in 21 CFR 101.81 would misbrand the food or dietary supplement under 21 U.S.C. 343(r)(1)(B). Moreover, failure to make a claim in accordance with the requirements in 21 CFR 101.81 subjects the product to regulation as a drug under 21 U.S.C. 321(g)(1)(B) because the product is intended to treat, cure, prevent, or mitigate a disease, coronary heart disease and/or hypercholesterolemia.

Your submission also indicates that, for the product **Square Roots Pro Bono**, you are making the claim, among others, that it is for “the prevention of osteoporosis.”

This statement is not a claim subject to 21 U.S.C. 343(r)(6), but a claim subject to 21 U.S.C. 343(r)(1)(B) for which FDA has authorized a health claim (see 21 CFR 101.72). A dietary supplement that meets the eligibility and message requirements set forth in this regulation may bear a claim for the relationship between calcium and osteoporosis. A health claim on the label or in the labeling of a food or dietary supplement that is not in accordance with the requirements in 21 CFR 101.72 would misbrand the food or dietary supplement under 21 U.S.C. 343(r)(1)(B). Moreover, failure to make a claim in accordance with the requirements in 21 CFR 101.72 subjects the product to regulation as a drug under 21 U.S.C. 321(g)(1)(B) because the product is intended to treat, cure, prevent, or mitigate a disease, osteoporosis. A claim about a relationship between magnesium and osteoporosis has not been authorized under 21 U.S.C. 343(r)(5)(D) and would, therefore, subject a product to regulation as a drug.

Your submission also states that you are making claims for a product named **Square Roots Napsack Melatonin Spray**. This product does not meet the statutory definition of a dietary supplement contained in 21 U.S.C. 321(ff), and therefore, can not be marketed as a dietary supplement.

The term "dietary supplement" is defined in 21 U.S.C. 321(ff). 21 U.S.C. 321(ff) provides that the term means a product (other than tobacco) intended to supplement the diet that bears or contains a vitamin, a mineral, an herb or other botanical, an amino acid, a dietary substance for use by man to supplement the diet by increasing the total dietary intake, or a concentrate, metabolite, constituent, extract, or combination of any of the above ingredients. 21 U.S.C. 321(ff) further states that dietary supplements are intended for ingestion in a form described in 21 U.S.C. 350(c)(1)(B)(i) or in compliance with 21 U.S.C. 350(c)(1)(B)(ii), are not represented as conventional food or as a sole item of a meal or the dietary, and are labeled as a dietary supplement.

Square Roots Napsack Melatonin Spray is not a product “intended for ingestion.” As stated above, the definition of dietary supplement in 21 U.S.C. 321(ff) states that a

dietary supplement is a product "intended for ingestion." The term "ingestion" has been addressed by the court in United States v. Ten Cartons, Ener-B Nasal Gel, 888 F. Supp. 381, 393-94 (E.D.N.Y.), aff'd, 72 F.3d 285 (2d Cir. 1995), which states:

The ordinary and plain meaning of the term "ingestion" means to take into the stomach and gastrointestinal tract by means of enteral administration. See Stedman's Medical Dictionary (4th Lawyer's Ed. 1976) (defining ingestion as the "introduction of food and drink into the stomach."); Webster's Third New International Dictionary (1976) (defining ingestion as "the taking of material (as food) into the digestive system.")...

The interpretation of the term "ingestion" to mean enteral administration into the stomach and gastrointestinal tract is also supported by the language of the statutory sections immediately preceding and following section 350(c)(1)(B)(ii). Section 350(c)(1)(B)(i) states that the vitamin must be intended for ingestion in tablet, capsule or liquid form. Each of these forms denotes a method of ingestion that involves swallowing into the stomach. Section 350(c)(2) states that a food is intended for ingestion in liquid form under section 350(c)(1)(B)(i) "only if it is formulated in a fluid carrier and is intended for ingestion in daily quantities measured in drops or similar small units of measure." This elaboration of "liquid form" also denotes ingestion by swallowing the fluid.

Therefore, because the term "ingestion" means introduced into the gastrointestinal tract, a product sprayed into, and absorbed from, the mouth is not subject to regulation as a dietary supplement because it is not "intended for ingestion."

Please contact us if you require further assistance.

Sincerely,

Lynn A. Larsen, Ph.D.
Director
Division of Programs and Enforcement Policy
Office of Special Nutritionals
Center for Food Safety
and Applied Nutrition

Copies:

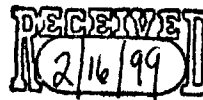
FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300
FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of
Enforcement, HFC-200
FDA, Minneapolis District Office, Office of Compliance, HFR-SW340

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Square Roots, Inc.

1500 Jackson Street N.E.
Minneapolis, MN 55413
612.706.9679

January 26, 1999



Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. S.W.
Washington DC 20204

Dear Sir or Madam:

This document is a notification letter of statements of nutritional support for product labeling (mail order catalog) in compliance with 21 CFR section 101.93 "Notification procedures for certain types of statements on dietary supplements."

Name and Address of the Company/Distributor making the following statements of support:

Square Roots, Inc., 1500 Jackson Street N.E., Minneapolis, MN 55413

The following statements apply to the line of Square Roots Square One Multivitamins:

- *Square One Men's Multivitamin*
- *Square One Men's Multivitamin for Vegetarians*
- *Square One Men's Multivitamin Powder*
- *Square One Women's Multivitamin with Iron*
- *Square One Women's Multivitamin with Iron for Vegetarians*
- *Square One Women's Multivitamin without Iron*
- *Square One Women's Multivitamin Powder with Iron*

A very good place to start. There's absolutely no substitute for eating well, but we've done the math and even the most health-savvy eater can't get it all, all the time. (Believe us, we've tried.) Nutrition is demanding and complicated...but it can be made easier. Square One Multivitamin products give you a simple and effective grip on better nutrition. Key vitamins and minerals are set at the levels scientifically established for positive prevention. We include nutrients in the forms most similar to food – like mixed carotenoids and a full spectrum of antioxidants. You can't find a more multi-talented multivitamin supplement anywhere.

Who: Men and women interested in a multivitamin regimen they can feel confident about.

Why: Nutrients in all Square One Multiples are specifically and carefully set at levels scientifically recommended for disease prevention. Nutrients are presented in the forms most like those in foods. And finally, we put our multivitamin in capsules rather than hard tablets to ensure easier absorption by the body. Taking a high quality multiple is smart. Taking a Square One Multiple is genius.

Hey everybody, gather 'round the nutrition panels. At Square Roots, our entire nutritional philosophy is encapsulated in our Square One Multiples. Everything we stand for, conveniently in the palm of your hand. We've all heard of the omnipresent RDA (Recommended Daily Allowance). For some powerful nutrients, like Vitamin C, the RDA is merely a scurvy-fighting minimum...and we all agree – scurvy's bad. However, there is expanding scientific consensus that for many nutrients, consumption at levels greater than the RDA will prove beneficial against serious diseases (and fighting disease is good). Take a close

look at the Square One nutrition panels and smile when you realize the painstaking balance and precise purity that fills our hard-workin' little capsules.

Our beta-carotene contains valuable carotenoids not found in synthetic products. Consumption of carotenoid-rich foods has been shown to reduce the risk of some cancers.

Antioxidants are right on target at levels established for positive prevention. 400IU of Vitamin E provides a level and a natural form not found in the commonplace multiple.

Square Roots Square One Multivitamins contain:

		%DV
Vitamin A (palmitate and 80% as Natural beta-carotene from Betatene)	25000IU	500%
Vitamin C (as ascorbic acid)	500mg	800%
Vitamin D (as cholecalciferol)	400IU	100%
Vitamin E (as d-alpha-tocopherol)	400IU	1300%
Thiamine (as Thiamine HCl)	7.5mg	500%
Riboflavin	8.5mg	500%
Niacin (as niacinamide)	100mg	500%
Vitamin B6 (pyridoxine HCl)	10mg	500%
Folic Acid	400 - 600mcg	100% - 150%
Vitamin B12 (as cyanocobalamin)	30mcg	500%
Biotin	300mcg	100%
Pantothenic Acid (as calcium pantothenate)	50mg	500%
Iron (Ferrochel)	0 - 18mg	0 - 100%
Calcium (Chelazome)	0 - 120mg	0 - 12%
Magnesium (Chelazome)	0 - 60mg	0 - 15%
Iodine (as potassium iodide)	150mcg	100%
Zinc (Chelazome)	15mg	100%
Copper (Lysinate / Histidinate)	2mg	100%
Vitamin K	25mcg	***
Selenium (chelate)	100mcg	***
Manganese (citrate)	3.5mg	***
Chromium (Chromemate)	100mcg	***
Molybdenum (chelate)	160mcg	***
Montmorillonite	25mg	***
Silicon (as silica proteinate)	2mg	***
Vanadium (as vanadyl sulfate)	10mcg	***
Boron (chelate)	1 - 2mg	***
Potassium (citrate)	30mg	***

***Percent Daily Value not Established

The following statement applies to *Square Roots Bodywork*:

There's a body of evidence that shows the benefits of glucosamine and chondroitin for joint flexibility, joint pain and workout recovery. Bodywork blends these nutrients in one easy-to-use, happy-to-have-it product. Glucosamine sulfate and chondroitin sulfate (two very busy nutrients) have demonstrated the ability to increase joint mobility and comfort. Bodywork is ideal for both enhanced injury recovery and ongoing joint maintenance. There is something smart and safe you can do about the condition of the structure you live in. Invite Bodywork over to your joint.

Who: Those seeking increased joint flexibility and comfort during and following physical activity

Why: Bodywork combines the joint nutrition properties of glucosamine and chondroitin to improve overall joint health.

Square Roots Bodywork contains:

- Glucosamine sulfate
- Chondroitin sulfate

The following statement applies to *Square Roots Push Play*

If you typically experience the agony of defeat in your post-game recovery, consider Push Play. This anti-inflammatory helps alleviate the symptoms of joint and muscle injury or overuse. A blend of bromelain from pineapple, turmeric spice and bioflavonoids from citrus make up this effective inflammation formula. It's a win-win situation.

Who: Athletes or active individuals wanting to effectively treat joint and muscle pain

Why: Push Play is a safe and effective inflammation formula

Square Roots Push Play contains:

- Vitamin C
- Turmeric Root Extract
- Quercetin
- Bromelain
- Rutin

The following statements apply to *Square Roots Tough Cell*

The deal with free radicals. Free radicals are evil rascals that enjoy breaking rank with a well-organized system. They are highly reactive, pushy molecules that injure cell membranes, cause defects in DNA and contribute to aging and degenerative diseases. Exercise and physical activity trigger free radical production...but this is no reason to stop working out (oh no, you aren't getting off that easily). Antioxidants, like those found in our Tough Cell formulation, act as free radical-neutralizing scavengers and protect cells from their harmful advances. Free radicals are the method in the madness that is a healthy body – send them packing with Square Roots Tough Cell.

Tough Cell is power hungry antioxidant supplement ready to squash free radical behavior. Antioxidants are most effective in combating cell damage when taken in combination form. The Square Roots formulation of Vitamin C and E, beta-carotene in the form of mixed carotenoids, zinc and selenium provides this combination for broad, hard-nosed free radical protection. This radical activity shall be crushed.

Who: Anyone active in sports, frequent workouts or physically-demanding jobs.

Why: Tough Cell is designed to deliver extra antioxidant protection for people who need it. Take it with a Square One Multivitamin? Even Better.

Square Roots Tough Cell contains:

- Vitamin C
- Vitamin E
- Beta-carotene
- Zinc
- Selenium

The following statements apply to *Square Roots Water Power*

Water Power Rehydration Mix: Proper hydration is a wonderful thing and Water Power is just the thing. With good hydration, we humans could rule the planet (oh yeah, we do...see, it worked). Athletic endeavors dry us out and this triggers all manner of trouble. Orange-flavored Water Power replaces lost electrolytes and neutralizes nasty lactic acid with on-board glutamine. For your personal best, turn on the Water Power.

Who: Anyone seeking a great-tasting beverage to enhance rehydration during and after exercise.

Why: Water Power is a dry powder that delivers more valuable nutrients than ready-to-drink liquids subject to water destabilization of their ingredients.

The following statements apply to *Square Roots Vegetable Scoop*

They wait unordered on menus, they hide under napkins, they fall quietly from plates. They are vegetables and we don't eat enough of them. Thanks to Vegetable Scoop, with the flick of a wrist you can get the nutrients in that elusive 5-7 daily serving recommendation. Proof is everywhere that vegetables are ideal for overall wellness and especially helpful in lowering the risk of some types of cancer. Vegetable Scoop is your secret weapon way of slipping them into your family's diet. Stir into shakes, juices or add to foods when cooking.

Who: All of us struggling to get our 5-7 servings of vegetables each day.

Why: Vegetable Scoop contains tomatoes, corn, carrots, celery, beets, parsley and spinach. Not a single nutrient or micron of fiber has been processed out.

The following statements apply to *Square Roots Soy Protein Scoop (Plain and Chocolate Fudge)*

The humble soybean is a nutritional heavyweight. Unless you've been residing in a tree house, you've heard about the impressive list of health perks provided by soy. You've also heard that soy tastes like, well, like soy. Square Roots Soy Scoop will change your mind. It's packed with all the benefits and tastes un-soy great. Heroic efforts have been made to make Soy Scoop more than tolerable on your tender tongue. Soy is highly beneficial to a wide array of human systems and provides an outstanding low-fat source of protein in a vegetable form (see "The Good Word on Soy"). Blend with H2O, a tall glass of milk or juice, or soy up your favorite foods.

Who: Anyone, especially women, striving to get more protein into their diet or looking for a convenient and better tasting way to enjoy the many benefits of soy.

Why: Soy Scoop is a great tasting, low-fat source of vegetable-based protein and nutrients. It contains only the best water-processed soy protein to ensure that critical isoflavones are retained.

The Good Word on Soy:

Soy comes from the soybean, and good stuff comes from soy. Populations that make soy a fundamental part of their daily diet have shown a significant lack of breast, prostate and colon cancer. Soy reduces elevated cholesterol levels to lessen the risk of heart disease. Plus, soy has demonstrated an ability to increase bone density while reducing calcium loss. This busy bean has also been shown to reduce hot flash occurrence in menopausal women.

Go Soy

The following statements apply to *Square Roots Green Scoop*

No matter what the trend, you always look and feel great in green. Green Scoop is the easy route to a healthy helping of the nutrients found in green leafy vegetables. Green Scoop is made with wheat grass, a packed source of vitamins, minerals, antioxidants and phytonutrients. Mix with fruit juices, vegetable juices or blended fruit drinks for a unique taste and a greenhouse of benefits.

Who: Anyone striving to get the nutrient benefits of dark green leafy vegetables.

Why: Green Scoop provides a pure, concentrated helping of the nutrients found naturally in green plants like wheat grass. It does not contain any extraneous herbs often found in similar products.

The following statements apply to *Square Roots Fiber Scoop*

Two things to consider: 1) few of us get enough fiber; 2) fiber is not the exclusive concern of the shuffleboard set. Fiber Scoop is a simple way for you to bring your fiber intake up to recommended levels. Our product is 100% oat bran, packed with both soluble and insoluble fiber. Fiber has been associated with lower cholesterol and the reduced occurrence of colon cancer (two more big things to consider). Easy-to-mix oat bran won't clump or thicken when mixed with beverages or other foods.

Who: Anyone (younger, older or in-between) striving to put more cholesterol-lowering, colon cancer-fighting fiber in their diet.

Why: Fiber Scoop delivers 3 grams of the fiber per tablespoon with no added sugar. It mixes easily and has only minimal flavor impact when combined with other foods.

The following statements apply to *Square Roots Point Guard*

HDL (the honorable) cholesterol against LDL (the less-than-honorable) cholesterol...it's the classic struggle of good vs. evil. Point Guard is a safe, effective and convenient way to throw this fight in your favor. Point Guard combines, into one product, the nutrients and minerals demonstrated to be most powerful in cholesterol control. Garlic: helps lower cholesterol and blood pressure. Niacin: shown to decrease production of LDL (bad) cholesterol, while raising the good stuff (HDL). Chromium: aids in reducing cholesterol and triglyceride levels. Guggulipid (plant extract): helps increase the liver's ability to remove LDL. Beta-sitosterol (Plant extract oil): assists in inhibiting absorption of cholesterol from food. Tocotrienol: reduces the production of LDL cholesterol. Point Guard is the purely simple way to control cholesterol levels in one heart-guarding product. Get straight to the Point (Guard).

Who: Men and women with mild to moderate elevation in cholesterol

Why: An effective blend of five research-supported, cholesterol controlling elements in one product.

If you currently use a prescribed cholesterol medication, be sure to consult your doctor before adding Point Guard to your heart regimen.

The following statements apply to *Square Roots Top Seed Flax Seed Oil Supplement*

The fact on flax: Flaxseed oil is a rich, vegetarian source of Omega 3 and Omega 6 essential fatty acids critical to heart health. The fact on Top Seed: An excellent way to get these essential fatty acids. Proper levels of Omega 3 and Omega 6 are used by the body to regulate the cardiovascular, immune, reproductive and nervous systems. Maintaining these levels is difficult through normal diet, but undeniably easy with Top Seed. Don't deny yourself the healthy benefits of Top Seed.

Who: Anyone concerned with maintaining a healthy heart and circulatory system, especially those with a family history of heart disease.

Why: The easy way to get Omega 3 and Omega 6 essential fatty acids from an outstanding plant source. Top Seed is specially designed to work in conjunction with other heart products.

The following statements apply to *Square Roots Full Circ*

Don't let anyone mess with your heart (or your circulatory system). Full Circ is a unique blend of nutrients that helps safeguard the health of both. Full Circ incorporates scientifically proven ingredients with a truly legitimate track record: Vitamin E – helps keep LDL cholesterol (the naughty stuff) from oxidizing and depositing on arterial walls. Selenium – helps antioxidant effectiveness. Vitamin B6, B12 and Folic acid – contribute to maintaining optimal homocysteine levels. Coenzyme Q10, Resveratrol, Pine Bark Extract and Grape Seed Extract – provide powerful, natural antioxidants that protect the heart from free-radical damage. Full Circ is peace of mind for your heart.

Who: Anyone seeking to maintain a healthy heart and circulatory system, particularly those with a family history of heart disease.

Why: Full Circ incorporates safe, research-supported nutrients into one convenient product for improved cardiovascular health.

If you currently use a prescribed heart medication, be sure to consult your doctor about the possibility of adding Full Circ to your heart regimen.

The following statements apply to *Square Roots Pro Bono*

If you drink three full glasses of milk each day (or soak a whole lot of cereal) read no further. You sub-three milk drinkers listen up. Calcium and magnesium are critical to the development of strong bones and the prevention of osteoporosis. Pro Bono combines calcium and magnesium for optimal bone-building performance. Our high-test calcium mix is found to be extremely absorbable to the human body. Bone appetit.

Who: Women concerned with building and maintaining strong bones.

Why: Pro Bono's nutrient formulation and capsule form help the body better absorb the bone-strengthening benefits of calcium and magnesium.

The following statements apply to *Square Roots Food Phyte*

Don't fight it...you know you should be getting the isoflavones intrinsic to soy. Isoflavones are the primo nutrients contributing to the significant health benefits associated with soy, including: improved cardiovascular support, reduced cancer risk, increased bone density and reduced menopausal symptoms. It's simple to see the advantages, but difficult to get them via food. Food Phyte makes the getting' convenient, good and easy. The fight to get soy into your diet has officially been won.

Who: Those interested in the health benefits of soy who are also at a loss as to how to get it into their diets.

Why: Food Phyte provides beneficial soy isoflavones at levels similar to those found in soy-based diets.

The following statements apply to *Square Roots Cran Can*

Good urinary tract health requires a cran-do attitude. Cran Can is an all natural product of cranberry extract concentrated in capsule form. It has been shown that the properties of cranberry effectively promote a healthy bacteria balance in the urinary tract. Use Cran Can as needed, or routinely if urinary tract health is a frequent concern. Cran Can is equivalent to 8 ounces of cranberry juice cocktail. If you like the juice, drink up. If you prefer the convenient, no-calorie, no-taste approach, consider Cran Can. (We just love to say "Cran Can")

Who: Women concerned with maintaining urinary tract health

Why: One capsule of Cran Can contains a standardized concentrated dose of natural cranberry extract

The following statements apply to *Square Roots Over Easy PMS Relief*

No special occasion is necessary for roses, but there is one time of the month when primroses would be especially appropriate. Square Roots Over Easy PMS supplement is made up of essential fatty acids from evening primrose oil. These fatty acids are generally lacking in most women's diets, which can add to PMS severity. Over Easy aids in the relief of both the physical and emotional symptoms common to PMS. We highly recommend the primroses in Over Easy, and any roses in a vase, for maximum PMS relief.

Who: Women with mild to moderate symptoms of PMS.

Why: Over Easy gel caps provide a standardized amount of GLA, the prime fatty acid required to minimize PMS discomfort.

The following statements apply to *Square Roots Stress-O-S*

Stress-O-S telegraphs a natural, non-addictive, relaxing message to your body... and your body responds. Stress-O-S promotes physical relief from symptoms of stress and anxiety with kavalactones, a natural extract of the Kava Kava plant. Anxious about that career-making presentation? Put Stress-O-S on your side, without side effects or grogginess. Our hero. (Stress-O-S is a no-no for women who are pregnant or nursing.)

Who: Men and women looking for a safe, natural way to relieve symptoms of anxiety.

Why: Stress-O-S promotes relaxation without side effects. It contains a standardized dose of 75mg kavalactones from the Kava Kava plant.

The following statements apply to *Square Roots Belly Dance*

Your digestive system needs dance partners to stay in top shape. Belly Dance steals the floor with its nimble and coordinated fructooligosaccharides – a.k.a., “food for the beneficial bacteria” (similar to yogurt's active cultures) that encourage a healthy digestive tact. Good guy bacteria get after the bad boy bacteria to help promote colon health and food digestion. This formula closely matches the elements found in food and naturally occurring in a healthy, happy digestive system. Keep your digestion on track with Belly Dance. I hear the music. . .c'mon let's dance.

Who: Anyone interested in a healthy digestive system.

Why: Belly Dance contains a good, natural balance of friendly bacteria which promote colon and overall digestive health.

The following statements apply to *Square Roots Defense Lozenges* and *Square Roots Defense Powder*

Stick out your tongue at the flu

When cold and flu symptoms start plotting against your immune system, it's time to take the offense with Square Roots Defense Lozenges. These little bullets are formulated to dissolve the duration and severity of common cold and flu symptoms. Three effective cold-fighting ingredients are packed into one easy-to-take, reasonably tasty lozenge. Vitamin C, Zinc and Echinacea (a plant extract shown to stimulate the immune system) combine to beat back the major effects of colds and flu. Stick out your tongue and say “ah-ah.”

For those who prefer an alternative to our Defense Lozenges, there's Defense Powder. Everything cold and flu symptoms hate about our lozenge formula is present in stir-and sip powder form. Cheers.

Who: Anyone suffering from the symptoms of a cold or flu.

Why: Increased immune protection with standardized doses of Vitamin C. Zinc and Echinacea to minimize a cold or flue episode.

The following statements apply to *Square Roots Napsack Melatonin Spray*

Oh, perchance to sleep. A night full of the stuff is one of the healthiest things you can do for yourself. But, sleep does not always come easily. Square Roots Napsack is a melatonin spray that helps your body take its organic sleep cue. Melatonin is the substance your body produces to regulate sleep patterns. A mild dose sprayed under the tongue helps you fall asleep quicker and get a better night's sleep. Napsack is ideal for time-zone hopping travelers. And furthermore . . . ZZZZZZZZ.

Who: Anyone seeking a safe, mild, sleep aid.

Why: The melatonin in Napsack that helps you sleep without inducing wake-up grogginess. Our spray formula is ideal for quick absorption and maximum effectiveness.

The following statements apply to *Square Roots Fiber Capsules*

Fiber is important. Everyone needs about 30g per day, but the average diet yields only 15g. That's why we're giving you more than one way to get it. Our Fiber capsules do all the good deeds of our Scoop version in a quick, convenient, easy-swallow form.

Who: Anyone striving to put more cholesterol lowering, colon cancer-fighting fiber in their diet.

Why: Fiber Capsules are a convenient and easy way to round out your daily fiber intake

The following statements apply to previously mentioned Square Roots Products sold in bundled gift and regimen form

Athlete Bundle

The perfect package for your athletically inclined recipient.

Tough Cell (pg.8) keeps the free radicals at bay with a serious dose of antioxidants.

Water Power (pg.8) pours on the re-hydration with electrolytes and glucose in drink-it-up orange flavor.

Stress Relief Kit

You know who they are and we know what they need...a care package with a pair of Square Roots stress-busting products.

Stress-O-S (pg. 25) a natural stress-soothing, anxiety-reducing formula featuring extracts of the Kava Kava plant.

Napsack (pg25) a welcome, sleep-supporting dose of Melatonin in simple spray form.

Square Routine for Athletes

Whether you're driving the lane, hitting the road, pressing the metal or running the bases, we have the Routine for you. The endeavors of physical activity take it out, Square Routine for Athletes puts it back. People who work out regularly have unique nutritional needs, and this package of products is designed to work for you.

A *Square one Multivitamin* (chose one from the selection on pages 4 & 5) builds a strong foundation.

Tough Cell (pg8) provides antioxidant protection.

Water Power re-hydration mix (pg. 8) helps replenish lost Carmen electrolytes.

Square Routine For Cholesterol

Cholesterol, cholesterol, cholesterol. It's good, it's bad, it's ugly. If it's high, it's trouble. This serious health problem can be considerably improved through nutrition and the protective qualities found in specific nutrients.

A **Square One Multivitamin** (choose one from the selection on pages 4 and 5) is your first move toward improved cholesterol health.

Point Guard (pg. 20) combines the specific protective nutrients into one cholesterol-busting product.

Fiber capsules (pg. 25) work together with the Point Guard formulation to naturally fight cholesterol.

This Routine is for anyone with a moderate cholesterol elevation. See an MD if your levels read in the higher ranges.

Square Routine For Women

Women have special daily nutritional needs due to the complexities of being female. The reproductive system puts stresses and demands on the overall well-being of all women. This Square Routine delivers the basics to better health.

A **Square One Multivitamin** (choose one from the selection on pages 4 and 5) leads the charge.

Food Phyte (pg.22) provides the numerous health benefits associated with soy isoflavones.

Pro Bono. (pg. 22) boosts your levels of bone-strengthening calcium and magnesium.

Square Routine For A Healthy Heart

Listen to your heart and get to know this Square Routine. For those with heart disease or other cardiovascular issues, this is a package you can love. Take it to heart with an intelligent combination of hard working Square Roots products.

A **Square one Multivitamin** (choose one from the selection on pages 4 and 5) sets the stage for an excellent long-term relationship.

Full Circ (pg.21) gives you an honest dose of heart-protecting nutrients.

Top Seed (pg.21) provides essential fatty acids critical to cardio health.

Be sure to check with your doctor about adding this Square Routine to your daily health regimen.

Our catalog is also included with this document for your review.

Sincerely,



Michael Helser, Ph.D.
Vice President of Merchandising
Square Roots, Inc.